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Attorneys for Michael Goldberg,
Trustee of the PFI Trust

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re

PROFESSIONAL FINANCIAL
INVESTORS, INC., *et al.*,¹

Debtors.

PROFESSIONAL FINANCIAL
INVESTORS, INC. and PROFESSIONAL
INVESTORS 45, LLC,

Plaintiffs,

v.

CAROL SUE SPROULE AND FELIX ARTS,

Defendants.

Case No. 20-30604
(Jointly Administered)

Chapter 11

Adv No. 21-03035

**REQUEST TO STAY ADVERSARY
PROCEEDING**

Date: January 20, 2021

Time: 2:00 p.m.

Judge: The Hon. Hannah Blumenstiel

Courtroom: Virtual

Michael Goldberg, in his capacity as Trustee of the PFI Trust, which is the successor in interest to the original plaintiff herein ("Plaintiff"), hereby reports that this matter is the subject of a fully-executed settlement agreement between the litigants that awaits only the closing of the real

¹ A complete list of the Debtors and their respective chapter 11 case numbers may be found at www.donlinrecano.com/Clients/pfi/index. The federal tax identification numbers of each of the Debtors is also available in the bankruptcy petitions of each Debtor, also available at the Donlin Recano website.

1 estate transaction involving the real property at 1099 D Street in San Rafael – an event expected to
2 occur in February, 2022. Accordingly, and with the full consent and agreement of the Defendants,
3 Plaintiff requests that this matter be stayed indefinitely, pending a follow-up request for dismissal
4 upon the closing, or such other notice to the Court as is appropriate under the circumstances.

5 Dated: January 19, 2022

PACHULSKI STANG ZIEHL & JONES LLP

6 By /s/ John D. Fiero

7 Debra I. Grassgreen

8 John D. Fiero

9 Cia H. Mackle

10 Attorneys for Michael I. Goldberg,
11 Trustee of the PFI Trust
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STATE OF CALIFORNIA)
CITY OF SAN FRANCISCO)

I, Oliver Carpio, am employed in the city and county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is One Market Plaza, Spear Tower, 40th Floor, Suite 4000, San Francisco, CA 94105-1020.

On January 19, 2022, I caused to be served the following documents in the manner stated below:

• **REQUEST TO STAY ADVERSARY PROCEEDING**

<input checked="checked" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): The foregoing document was served by the court via NEF and hyperlink to the document. On <u>January 19, 2022</u> , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below.
<input type="checkbox"/>	(BY OVERNIGHT DELIVERY) By sending by FedEx and/or USPS Express Mail to the addressee(s) as indicated on the attached list.
<input type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
<input type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on January 19, 2022 at San Francisco, California.

/s/ Oliver Carpio
Legal Assistant

ECF/NEF List

- J. Barrett Marum bmarum@sheppardmullin.com, egarcia@sheppardmullin.com
- Nathan A. Schultz nschultzesq@gmail.com, kjarashow@goodwinlaw.com